June 14, 2022

Liane M. Randolph, Chair California Air Resources Board 1001 I Street Sacramento, CA 95814

RE: 128 California Academics Respond to California Air Resources Board 2022 Scoping Plan

Dear Honorable Governor Gavin Newsom and the California Air Resources Board,

We write to you as representatives of the academic and scientific community in California urging you to make updates to the 2022 Draft Scoping Plan that reflect the latest science and rapidly deteriorating climate reality. Not only is 2045 too late for carbon neutrality, the strategies recommended in the Scoping Plan are inadequate and unjust.

To maintain a livable planet and prevent further unthinkable suffering, the United Nations has made clear that policymakers around the world have a matter of months left to mobilize on a plan to dramatically wind down fossil fuel use, rapidly deploy renewable energy, and electrify end uses. With California's outsized influence in global climate policy, the state will either be a guiding light for the world in response to this urgent call to action or serve as a key barrier. If the state adopts the Scoping Plan as is, it will be the latter.

Instead of leading on direct emission reductions, the draft Plan makes no changes to the emission reduction targets adopted in 2017, and does not heed Governor Newsom's call to accelerate targets. The Air Resources Board is <u>proposing to cut emissions</u> 40% by 2030 and less than 80% by 2045. This puts California behind states like New York and Washington, the Biden administration's own target of reducing emissions by 50% by 2030, and other nations like the United Kingdom and the European Union.

The Scoping Plan could put California on an immediate path to reducing fossil fuel pollution, particularly in frontline communities, which would have the added benefit of improving health outcomes and creating economic opportunities where they are most needed. Instead, the Scoping Plan pushes a risky strategy that trades immediate emissions reductions for a reliance on unproven technology to be utilized in the future. This path risks locking in polluting infrastructure by relying far too heavily on carbon capture, utilization and sequestration (CCUS), and direct air capture (DAC). For example, the plan unrealistically projects California will use 100 million metric tons (MMT) of direct air capture in 2045. Globally, only 0.01 MMT of direct air capture is happening today.

CCUS, promoted by the oil and gas industry, has been disproven over decades of use, with recent studies showing that <u>80% have ended in failure</u> and <u>most of the carbon</u> that was captured was used to produce more climate-polluting fossil fuels. DAC is nascent, costly and

unproven at scale. Relying on these technologies, rather than moving forward with known solutions, is foolhardy and dangerous, and it is frontline communities who will pay the price.

We cannot afford to gamble on our future. As academics and data experts, we're dismayed to see a plan that is so light on details and contains a <u>significant math error</u>. Additionally, CARB vastly underestimates the social cost of carbon, instead of using \$50 per ton of pollution <u>emitted</u>, and by doing so, depreciates the costs climate change will have on our healthcare, food and economic systems.

An issue as devastating and urgent as the climate crisis demands sophisticated and determined analysis to pair together cost-effective, ambitious strategies that would result in feasible yet aggressive action. This plan does not meet that threshold.

It is vital that CARB listen to scientists, energy experts and community members above the fossil fuel industry.

Per the United Nations Intergovernmental Panel on Climate Change latest reports, California should be working to <u>triple the deployment of renewable</u> energy generation, prohibit permitting any <u>new fossil fuel infrastructure</u>, and phase out existing fossil fuel infrastructure by electrifying transportation, buildings and other sectors.

There is still time for CARB and Governor Newsom to deliver a bold climate blueprint that centers equity and public health and focuses on a no-regrets approach of renewable energy investment. Thank you for your consideration of these important changes for California communities and our climate.

Sincerely,

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